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January 11, 2021

Via ECF

Hon. Debra C. Freeman, Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

RE: Steve Downie v. Lloyd's Underwriters, et al.
Civil Action #: 19-cv-6620

Your Honor:

Plaintiff and Defendants submit this joint and detailed discovery proposal pursuant Your Honor's order for same during the January 7, 2021 telephone conference in the above referenced case.

INTERROGATORIES, DOCUMENT DEMANDS

Plaintiff will respond to Defendants' Second Interrogatories and Document Demands on or before January 11, 2021.

Defendant will produce all previously produced, redacted documents in unredacted form on or before January 11, 2021

DEPOSITIONS

Defendant will take Plaintiff's deposition on or before January 31, 2021.

Plaintiff will take Defendant's 30(b)(6) deposition on or before February 9, 2021.

Any necessary party and non-party depositions will be completed by March 12, 2021.

EXPERT DISCOVERY

All affirmative expert reports will be served on or before March 12, 2021.

All rebuttal expert reports will be served on or before April 2, 2021.

All expert depositions will be completed on or before April 12, 2021.

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DISCOVERY END DATE

All discovery will be completed on or before April 12, 2021.

Respectfully Submitted,

SCHWARTZ, CONROY & HACK, PC

By: Michail Z. Hack
Michail Z. Hack

MZH/gw
cc: All Counsel of Record via ECF

SO ORDERED.

Dated: 1/14/21
New York, New York

While the above schedule is approved, this Court will grant no further extensions of the deadline for the completion of all discovery.

Debra C. Freeman
Debra C. Freeman
U.S.M.J.

(This resolves Dkt. 37.)